

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, JOHN DOE, JANE DOE 1, JANE
DOE 2, and JANE DOE 3,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

DECLARATION OF JANE DOE 1

I, Jane Doe 1, declare as follows.

1. I am over the age of eighteen years, and the facts set forth herein are true and correct to the best of my personal knowledge, information, and belief.

2. I am a female Jewish undergraduate at the University of Virginia (“UVA”), and a resident of Charlottesville, Virginia. I attend Congregation Beth Israel in Charlottesville.

3. My sister is Jane Doe 3, and my mother is Jane Doe 2.

4. On August 11, 2017, Defendants had organized and engaged in a torchlight march in Charlottesville, which was to culminate at the statue of Thomas Jefferson near the Rotunda at UVA. I peacefully protested Defendants’ neo-Nazi and white supremacist march at the Rotunda, along with a group of around 30 students and community members who locked arms around the Thomas Jefferson statue.

5. As Defendants’ mob reached the steps of the Rotunda, hundreds of neo-Nazis and white supremacists descended upon us and circled us, preventing us from leaving the area. They shouted racist and anti-Semitic threats and chants. They also sprayed protesters with mace or another type of caustic substance, which made my eyes burn and made it hard to breathe. I was terrified and feared for my life, and was eventually able to escape the area.

6. On August 12, 2017, Defendants continued their neo-Nazi and white supremacist march, and I again peacefully protested, this time with Jane Doe 2 and Jane Doe 3.

7. During the protest, Jane Doe 3 and I were part of a group of counter protesters on Fourth Street in downtown Charlottesville. While we were peacefully protesting, Defendant Alex Fields intentionally drove a car directly into our crowd of defenseless people, striking me and several other protesters.

8. I woke up on the ground in severe pain, disoriented, bleeding from a laceration on my head, and in shock. My sister Jane Doe 3 was by my side and tried to stop the bleeding. After about 25 minutes, an ambulance arrived and rushed me to the hospital. The hospital was on lockdown because of the car attack, and my sister was not allowed in with me.

9. The car attack broke both of my legs, caused me to suffer a concussion and severe contusions, and I required major surgery to repair bone and multiple ligaments. I spent several days in the hospital, and my recovery will take over a year and require extensive physical therapy sessions several times each week. I also experience emotional distress as a result of the attack, and am unable to return to school full time. I am currently in psychological counseling to help me cope with my new physical limitations resulting from my injuries.

10. In the aftermath of the events on August 11-12, I have met with a security expert and have taken steps to increase my safety and guard against further harm from Defendants and their supporters.

11. I fear that if my identity is disclosed in this action, I will be targeted by Defendants and/or their supporters and sympathizers because I am a Jewish plaintiff and was a counter-protester, and will be subjected to further threats, harassment, violence, and other physical and mental harm. And, if my identity is disclosed, it would also reveal the identities of my close relatives -- including my mother Jane Doe 2 and my sister Jane Doe 3, and subject them to similar physical and mental harm.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed this 13th day of November, 2017 in Charlottesville, Virginia.

/s/ Jane Doe 1
Jane Doe 1

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